

IN THE
UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

SEP 26 2023

PER

 DEPUTY CLERK

George Ivan Lopez)	Case No: 3:21-Cv-1819
Plaintiff,)	Hon. Christopher C. Conner
-VS-)	Hon. M.J. Karoline Mechalectchic
John Wetzel, et al.,)	
Defendants.)	

**EMERGENCY MOTION FOR A HEARING
PERTAINING TH DEFENDANTS FAILURE TO PRODUCE DISCOVERY**

Now Comes, Plaintiffs **Lopez, Watkins**, hereby moves this Honorable Court for a Hearing to discuss the defendants refusal to disclose requested discovery per Rule 26 of The Federal Rules of Civil procedure, and in support states as follows:

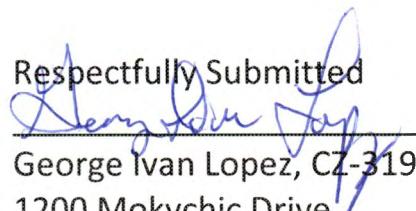
In according with the Rules of the Federal Rules of Civil Procedure, Plaintiffs **Lopez, Watkins**, have made countless of attempts to ensure a smooth and ethical quick exchange of basic information between Plaintiffs and defendants' counsel, however, it has been short of a nightmare in this case, due to counsel **Kim Adams** continued refusal to produce relevant discovery material.

Counsel is taken advantage of the named Plaintiff due to not being represented by counsel. This court intervention is both necessary and crucial to keep balance and fairness to both sides. There is a due date that all discovery must be

completed by October 12, 2023. Which this date would be impossible, since counsel continued refusal to comply with Federal Rule 26.

Wherefore, for these reasons set forth above, Plaintiff Lopez, Watkins, respectfully request that this Honorable Court grant them both a hearing to discuss the defendants' failure to comply with this Federal Rule. prior of filing a Motion for an Order to compel and sanction against the defendants. Prayer for Relief.

Respectfully Submitted


George Ivan Lopez, CZ-3198
1200 Mokychic Drive
Collegeville, Pa. 19426

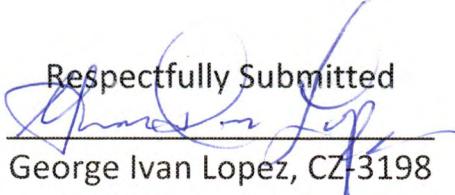
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UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

George Ivan Lopez) (Case No: 3:21-Cv-1819
Plaintiff,) (Hon. Christopher C. Conner
-VS-) (Hon. M.J. Karoline Mechalectchic
John Wetzel, et al.,) (
Defendants.) (

CERTIFICATE OF SERVICE

I, the undersigned hereby certify that on this 13th day of September 2023, a true and correct copy of this Emergency Motion has been served upon the defendants counsel Ms. Kim Adams, on this 13th day of September, via First Class mail which satisfy the courts requirements.

Ms. Kim Adams, Esq.
Attorney for Defendants
1920 Technology Parkway
Mechanicsburg, Pa. 17050

Respectfully Submitted

George Ivan Lopez, CZ-3198
1200 Mokychic Drive
Collegeville, Pa. 19426

FIRST CLASS MAIL

Name: George L. Lopez
Number: #CZ-3198

Box 244
Collegeville, PA 19426-0244

In Re: 3:21-cv-1819

RECEIVED
HARRISBURG, PA

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Legal Mts

To: United States District Court for The
Middle District of Pennsylvania
228 Walnut street
P.O. Box 983
Harrisburg PA 17108

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